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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-893

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)
and 960)

RACHEL IVANCA GUZMAN TOLEDO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

DONALD FARRIER, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 3, 2011, within the Eastern District of New York and elsewhere, the defendant RACHEL IVANCA GUZMAN TOLEDO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On or about September 3, 2011, the defendant RACHEL IVANCA GUZMAN TOLEDO arrived at JFK International Airport ("JFK") in Queens, New York aboard Jet Blue flight no. 830 from Santo Domingo, Dominican Republic.


2. The defendant RACHEL IVANCA GUZMAN TOLEDO was selected for a Customs and Border Protection ("CBP") examination of her luggage. During that inspection, she presented a "Timberland" brand suitcase. When asked if the bags and everything in them belonged to her, the defendant responded "Yes."

3. During the examination of the suitcase, the CBP officer noticed that the bottom of the suitcase was unusually thick and appeared to have been altered. The defendant RACHEL IVANCA GUZMAN TOLEDO became very nervous and appeared to be trembling and sweating.

4. A probe of the bottom of the suitcase revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the white powdery substance recovered from the defendant's suitcase was 2,020.8 grams.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant RACHEL IVANCA GUZMAN TOLEDO be dealt with according to law.



DONALD FARRIER
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
4th day of September, 2011

HONORABLE
UNITED STATES
EASTERN DISTRICT OF

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